



JACK I. SUMMERS
502 PARK AVE -15A
NEW YORK, NY 10022
(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

TRUMP CORP
TRUMP DOCK AVE
725 FIFTH AVENUE
NEW YORK, NY 10022

Jury Trial: ☒ Yes ☐ No
(check one)

16 CV 0111

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name JACK I. SUMMERS
Street Address 502 PARK AVENUE
County, City NEW YORK
State & Zip Code NY 10022
Telephone Number 917 588 6212

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name TRUMP CORP
Street Address 725 FIFTH AVENUE

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

New York, NY

B. What date and approximate time did the events giving rise to your claim(s) occur?

Nov 2015 - Jan 2016

C. Facts:

please see ATTACHED

Bad Grounds.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

ongoing financial burden caused by constant
Trump Litigation - Mental Harassment &
Deprive of Proper Legal Protection in NY
civil courts -

explained in Supporting Document

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____

stop THIS ORDER of EVICTION
 set to take place on January 10, 2016 -
 I will be homeless & lost whenever
 I am Possession I have.
 I have been harassed & put upon by prison
 & their attorneys.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7 day of January, 2016.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

500 PARK AVENUE
 NEW YORK NY
 10022

917-588-6212

5502@aol.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20__, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____

Affidavit
In Support of Order to
Show Cause

Plaintiff/Petitioner

Jack Summers

Formerly DBA
Pegasus Enterprises Ltd
502 Park Avenue -Apt 15 A
New York, NY 10022

Undertenant

Blaise Cozzolino a/k/a Alexander:
Blaise

Against

Trump Corporation
Trump Park Avenue, LLC
Landlord
725 Fifth Avenue
New York, NY 10022

I (Summers) am a Plaintiff/Petitioner tenant in the above-captioned action and I am fully familiar with the facts and circumstances set forth herein based on my personal knowledge.

Jack Summers formerly DBA as Pegasus Enterprises Ltd. is a military disabled veteran and will be 83 years old (July 2016).

The rent-stabilized apartment occupied by Summers has a rental, or condo sale value greatly in excess of the current rent stabilized (DRIE) rent. Trump would like to force Summers to vacate. Summers has lived in the same apartment for forty years when it was deemed a rent stabilized (J51) multi family residence.

Although Summers was willing to mutually resolve the problem the court ignored his pleas and defenses and Eviction Procedures were instituted.

Consideration should be given to the Rent Stabilized Harassment elements of 30 plus leaks and slow partial repairs since Trump took over the building that took more than 10 years to address. The ruling by Judge Davis for damaged property should be considered since no compensation was granted for the damages done. The frequency of lawsuits requiring attorneys was purposely instituted to force Summers into a difficult situation.

Summers was constantly at a disadvantage and could not exercise his Civil Rights because after several suits by Trump, Summers could no longer afford attorneys and had to act Pro-Se. In every instant the Trump attorney appeared be recognized by and have the advantage with the court. Based on all of the above, it has become apparent to Summers that Trump's plan is to get Summers out and sell the Apartment as a luxury condominium for millions of dollars.

Summers has been plagued and continuously harassed – over 30 damaging floods have inundated the apartment. Usually and until very recently, after considerable effort and

prodding by Summers only cosmetic repairs were done by Trump. The ongoing leak problem has caused recurring water and flood problems throughout the apartment.

Trump has continuously refused to compensate Summers for any damage to personal property and furnishings. Although they have attempted to correct the problem after so many years they have still left unsightly traps in the ceilings through out the apartment (Photos available if required) This evidences that TRUMP is not convinced that the flooding problem has been eliminated and will not recur.

Just recently the newest leak went untended for over six months until the court finally issued an order to repair. On the date the repairs were ordered no one showed up. A month later after the judge again issued an order the damage was finally repaired. But no penalty was assessed for the TRUMP lack of compliance with the court order. As a result of these flood/leak incidents, Summers has incurred in excess of \$ 50,000 in damages to personal property.

In contradiction to the New York State Rent Stabilized Tenant Harassment Laws Summers has been sued and had to be in court with Trump so many times that Summers can no longer afford attorneys and is legally disadvantaged having to appear as Pro Se in Housing Court.

Trump has also refused to add Blaise Cozzolino (AKA Alexander Blaise) to the lease for the apartment. However they always include him as a respondent thereby recognizing that he is a 30-year resident that shares the apartment.

Michael Notaro, one of the outside architects who inspected the Apartment, set certain facts forth that the previous band-aid repair effort by Trump indicating that the recurring water seepage; multiple violations of the building code above my ceiling were caused by water problems evidenced by rusted and rotted steel above the ceiling.

Through the kind auspices of The New York Bar Association's Veteran's Assistance Service Summers has been given the free services of the Prestigious Piper Law firm to represented his claim a case with the Veterans Administration for amended military disability due for the total loss of vision in my left eye. This occurred during his tenure as a Lieutenant/Pilot in the US Air Force.

WHEREFORE, not able to have his defenses heard and his CIVIL RIGHTS for a fair trail violated, the Court should have denied the Trump request for a judgment and award. Summers based on the Rent Stabilized Tenant Harassment Factors should have been granted compensation, and such other and further relief as the Court deems just and proper.

The State Courts have not acted in the proper fashion to protect Summers and his rights for a fair impartial judicial hearing. It was obvious from the onset that the TRUMP

attorneys had a distinct advantage and Summers forced to represented himself PRO-SE should have prevailed.

A Warrant of Eviction and Marshall's notice have been obtained by TRUMP. June 12, 2016 is the date set for the eviction. An eviction would greatly damage the health of the already disabled 82-year-old Summers and prevent him from receiving the medications that are mailed to his apartment. His daughter lives in Los Angeles and he would have no place to live and go with his possessions. His medications that have to be taken daily are sent to this address.

Summers requests the above cited factors and unpaid compensation be considered and that the court issues a Stay of the Housing Court Judgment and Eviction order, vacate the judgment and order a new trial.

Jack Summers

January 7, 2016



From the Armed Forces of the United States of America

Respectfully

JACK I. SUMMERS, IV 302 67 77, CAPT., AFRES

was Honorably Discharged from the

United States Air Force

25th

September 1967

and was subsequently honorably discharged from the

James G. Ryan Jr.
James G. Ryan Jr.
Colonel, USAF



DEPARTMENT OF VETERANS AFFAIRS
NEW YORK HARBOR HEALTHCARE SYSTEM

In Reply Refer To:

December 14, 2015

To Whom it May Concern,

This letter is to verify that Mr. Jack Summers (0195) is a patient of mine at the New York Harbor Healthcare system for the past 2.5 years.

He is diagnosed with a service connected neck injury that creates almost daily cerviogenic headaches. He reports increased frequency and intensity of these headaches over the past year. He is currently followed by Neurology, who has recently referred him for Feldenkrais therapy to help manage these increasing headaches.

Sincerely,

Michael Lin MD

MS # 202278

Medical Centers

Brooklyn Campus
600 Poly Place
Brooklyn, NY 11209
(718) 836-6600

New York Campus
423 E 23rd Street
New York, NY 10010
(212) 686-7500

**Primary & Extended
Care Center**

St. Albans Campus
179th St. & Linden Blvd.
St. Albans, NY 11425
(718) 526-1000

Healthcare Centers

Chapel Street Center
40 Flatbush Avenue Ext.
8th Floor
Brooklyn, NY 11201
(718) 439-4300

Harlem Center
55 W. 125th Street
11th Floor
New York, NY 10027
(212) 828-5265

Staten Island Center
Southport Plaza
1150 South Avenue
3rd Floor - Suite 301
Staten Island, NY 10304
(718) 761-2973

Location: NY-CARDIOLOGY SMILOWITZ 09/15/2014

Printed: 09/14/2014 22:00

***** CONFIDENTIAL MED RECONCILIATION SUMMARY pg. 1 *****
SUMMERS, JACK I 0195

----- PS02 - Recent Outpt Rx -----

Allergies: NKA,

Adverse Reactions: _____

Active and Recently Expired Outpatient Medications (including Supplies):

Active Outpatient Medications	Status
1) ACETAMINOPHEN 500MG TAB TAKE ONE TABLET BY MOUTH TWICE A DAY FOR PAIN OR FEVER	ACTIVE
2) ASPIRIN 81MG CHEWABLE TAB CHEW ONE TABLET BY MOUTH DAILY AS BLOOD THINNER	ACTIVE (S)
3) BACITRACIN 500/POLYMX 10000/GM OPH OINT APPLY 1/4 INCH RIBBON TO LEFT EYE EVERY MORNING	ACTIVE
4) CAPSAICIN 0.025% 60G/TUBE CREAM, TOPICAL APPLY SMALL AMOUNT EXTERNALLY TO AFFECTED AREAS TWICE A DAY FOR 30 DAYS FOR PAIN	ACTIVE
5) CHOLECALCIFEROL (VIT D3) 1,000UNIT TAB TAKE ONE TABLET BY MOUTH TWICE A DAY	ACTIVE (S)
6) DORZOLAMIDE 22.3/TIMOLOL 6.8MG/ML OPH SOL INSTILL 1 DROP IN LEFT EYE TWICE A DAY FOR GLAUCOMA (GENERIC COSOPT)	ACTIVE
7) FLUTICASONE PROP 50MCG 120D INHL, NASAL INSTILL 1 PUFF IN EACH NOSTRIL EVERY MORNING	ACTIVE
8) HYPROMELLOSE (TEARGEN II) 0.4% SOLN, OPH INSTILL 1 DROP IN EACH EYE FOUR TIMES A DAY AS NEEDED FOR DRY EYES	ACTIVE
9) ISOSORBIDE MONONITRATE 60MG SA TAB TAKE ONE TABLET BY MOUTH DAILY FOR HEART	ACTIVE
10) LEVOTHYROXINE NA 0.112MG=112MCG TAB TAKE ONE TABLET BY MOUTH EVERY MORNING (7A) FOR THYROID DEFICIENCY	ACTIVE
11) LISINAPRIL 5MG TAB TAKE ONE TABLET BY MOUTH DAILY FOR BLOOD PRESSURE AND HEART/KIDNEY PROTECTION	ACTIVE
12) METOPROLOL SUCCINATE 50MG SA TAB TAKE THREE TABLETS BY MOUTH DAILY FOR HEART	ACTIVE
13) OMEPRAZOLE 20MG EC CAP TAKE TWO CAPSULES BY MOUTH TWICE A DAY FOR STOMACH ACID	ACTIVE
14) SIMVASTATIN 40MG TAB TAKE ONE TABLET BY MOUTH AT BED-TIME DAILY FOR CHOLESTEROL (AVOID GRAPEFRUIT PRODUCTS)	ACTIVE
15) SODIUM CHLORIDE 5% 3.5G OINT, OPH APPLY 1/4 INCH RIBBON TO LEFT EYE AT BED-TIME DAILY	ACTIVE

Atorvastatin

Inactive Outpatient Medications	Status
1) CARBAMIDE PEROXIDE 6.5% 15ML SOLN, OTIC INSTILL 5 DROPS IN LEFT EAR TWICE A DAY FOR SEVEN DAYS	EXPIRED
2) DM/GUAIFENESIN 10/100MG/5ML (SF) LIQ TAKE 2 TEASPOONFULS BY MOUTH THREE TIMES A DAY AS NEEDED FOR COUGH	EXPIRED
3) LEVOTHYROXINE NA 0.15MG=150MCG TAB TAKE ONE TABLET BY	EXPIRED



**Department of
Veterans Affairs**

**245 W HOUSTON ST
NEW YORK NY 10014**

83 October 5, 2015

In Reply Refer To:

JACK I SUMMERS
502 PARK AVE APT 15A
NEW YORK NY 10022

File Number:
092-26-0195
PAYEE NO 00
J I SUMME

We are still processing your application for COMPENSATION. We apologize for the delay. You will be notified upon completion of processing. If you need to contact us, be sure to show the file number and full name of the veteran.

If your mailing address is different than that shown above, please advise us of your new mailing address. You should notify us immediately of any changes in your mailing address.

If you reside in the Continental United States, Alaska, Hawaii, Guam, the Northern Marianas, or Puerto Rico, you may contact VA with questions and receive free help by calling our toll-free number 1-800-827-1000 (for hearing impaired TDD 1-800-829-4833). From American Samoa you may dial toll free 684-699-3730.

Note: TDD phone number 1-800-829-4833 does not work for callers residing in Guam and the Northern Marianas.

J. CORRETJER

VETERANS SERVICE CENTER MANAGER